

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 04-10122-RWZ
)
)
 RENALD JEAN-BAPTISTE)

DEFENDANT'S MOTION FOR
OUT-OF-STATE TRAVEL EXPENSES

The defendant Renald Jean-Baptiste respectfully moves this Court, pursuant to 18 U.S.C. §4285, for an order directing the U.S. Marshals Service to provide him with either funds so that he may purchase round-trip transport between New York City and Boston, Massachusetts, or with tickets for such a round-trip on a common carrier. The defendant further moves that the U.S. Marshals provide funds sufficient for him to stay in Boston for one day, including a night's hotel, prior to his appearance before this court on Tuesday June 1, 2004.

As grounds for this motion, undersigned counsel states that Mr. Jean-Baptiste is required to appear in court on June 1 to enter a change of plea in the above-captioned case. Mr. Jean-Baptiste resides in New York City and is indigent. He needs to travel to Boston the day before this hearing, on Monday May 31, so that he can confer with counsel before the hearing.¹ Because

¹ It is impractical for counsel to confer with Mr. Jean-Baptiste on the day of the change of plea because counsel has court appearances in two other matters which will occupy her the

Mr. Jean-Baptiste is indigent, he cannot afford round-trip transportation to Boston or lodging here for the night before the hearing without hardship or having to incur indebtedness. For the above reasons, counsel for the defendant requests that this motion for travel funds be granted.

Respectfully submitted

By his attorney,

/s/ Syrie D. Fried

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entire morning of June 1.